

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MARC STOUT,)	
ROBERT STOUT,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:21-cv-559
)	
DEA AGENT KEENAN,)	
DHS AGENT KALENICH,)	
)	
Defendants.)	
_____)	

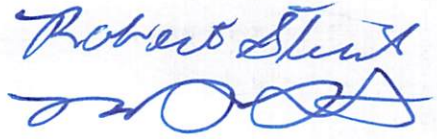
MOTION TO AMEND COMPLAINT

Plaintiffs hereby request that the court grant Plaintiffs leave to amend their complaint to include reference to, and incorporation of, their YouTube video titled "D.E.A. Building, Arlington, VA - Verbally-Charged Stand-Off Over Policy (Policy in Description)." The Plaintiffs' YouTube channel name is "Legalize Drugs." The link to the YouTube video is: <https://www.youtube.com/watch?v=CS5hmxbv65s&t=1047s>.

The Defendants reference two of the Plaintiffs' YouTube videos in the Defendants' Motion to Dismiss. The Plaintiffs invite the court to consider both videos, however, the Plaintiffs' complaint reflects the set of facts depicted in the YouTube video referenced by the Plaintiffs in this Motion to Amend.

The Plaintiffs have hereby dispensed with a Proposed Amended Complaint in light of the fact that it can be inferred from the Plaintiffs' Complaint that a video was referenced.

SUBMITTED,



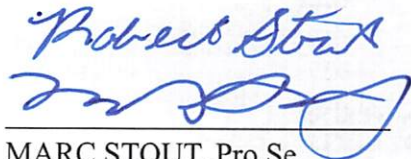
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DATE

CERTIFICATE OF SERVICE

Plaintiffs hereby certify that on November 8, 2021, a copy of this document was emailed to defense counsel, Catherine M. Yang, at catherine.yang@usdoj.gov.

SUBMITTED,



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GHOSTWRITING CERTIFICATE

Plaintiffs hereby certify that they did not receive help from an attorney in the preparation of this document.

SUBMITTED,



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